

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| <i>In the Matter of</i> |) | |
| |) | |
| Expanding Flexible Use of the 3.7 to 4.2 GHz Band |) | GN Docket No. 18-122 |
| |) | |
| Expanding Flexible Use in Mid-Band Spectrum |) | GN Docket No. 17-183 |
| Between 3.7 and 24 GHz |) | (Inquiry Terminated as to 3.7-4.2 GHz) |
| |) | |
| Petition for Rulemaking to Amend and Modernize |) | RM-11791 |
| Parts 25 and 101 of the Commission’s Rules to |) | |
| Authorize and Facilitate the Deployment of |) | |
| Licensed Point-to-Multipoint Fixed Wireless |) | |
| Broadband Service in the 3.7-4.2 GHz Band |) | |
| |) | |
| Fixed Wireless Communications Coalition, Inc., |) | RM-11778 |
| Request for Modified Coordination Procedures in |) | |
| Band Shared Between the Fixed Service and the |) | |
| Fixed Satellite Service |) | |

**COMMENTS OF ALASKA TELECOM ASSOCIATION ON
EXPANDING FLEXIBLE USE OF THE 3.7 GHz TO 4.2 GHz BAND**

The Alaska Telecom Association (“ATA”) files comments in this proceeding pursuant to the Public Notice issued by the Federal Communications Commission (“Commission”) on July 19, 2019¹. ATA’s members include local exchange carriers, wireless providers, and internet service providers serving Alaskans with advanced voice, data, and broadband service, including in many of the most remote communities of Alaska. These Comments express common concerns among ATA members.

¹ Wireless Telecommunications Bureau, International Bureau, Office of Engineering and Technology, and Office of Economics and Analytics Seek Focused Additional Comments in 3.7-4.2 GHz Band Proceeding, GN Docket No. 18-122 Public Notice, DA 19-678 (rel. July 19, 2019)

The Public Notice seeks comment on recent filings which offer recommendations for clearing C-Band spectrum and supplemental technical information. The recommendations referenced in the Public Notice are not viable in Alaska. Instead, C-Band spectrum remains the only way to deliver telecommunication services to much of remote Alaska. It is critical that this spectrum remain available and protected from interference in Alaska. Prior comments of ATA, Alaska Communications, and GCI explain in detail the importance of the C-Band in Alaska. The ATA agrees with AT&T Services, Inc. that the needs of non-contiguous regions of the United States are different and that reallocation in these areas merits separate policy consideration.²

The ACA Connects Coalition has proposed a spectrum clearing plan which would move MVPDs to fiber delivery.³ This is an unworkable solution for Alaska. Indeed, the ACA Connects Coalition itself observes that, “fiber delivery is not a possible solution for remote areas of Alaska,” and that “[s]uitable alternative solutions must be made available for incumbent C-Band operators who provide critical services throughout the State.”⁴ While fiber is available in many areas of Alaska, the remaining vast geography does not have fiber connectivity and relies on satellite services delivered via C-Band spectrum. There are no intermediary locations where the proposed “super” head-ends could be located which would make fiber delivery viable to all the remote locations currently reliant on C-Band. The closest fiber-connected locations where a

² AT&T Services, Inc. Comments (Oct. 29, 2018) at fn6. (“Not only are the needs different in Alaska, Hawaii, Puerto Rico, and the U.S. protectorates, but the considerations governing the satellites with coverage that includes those areas may also be considerably different. Thus, AT&T agrees with CBA that both the basis for, and the factual background of, the non-CONUS regions may militate in favor of separate consideration.”)

³ *Ex Parte* letter from ACA Connects – America’s Communication Association, Competitive Carriers Association, and Charter Communications, Inc., GN Docket No. 18-122 (filed July 2, 2019) (“ACA Connects Coalition Plan”).

⁴ *Id.* at 4, n.1.

“super” head-end could be constructed would likely still be hundreds of miles from most remote locations.

Construction of fiber transport facilities to endpoints closer to existing earth stations, as proposed in the ACA Connects Plan, would be prohibitively expensive in Alaska. Costs for construction of fiber have been estimated in the tens of millions of dollars just to partially connect the Aleutian Chain, and that is only a portion of one region of Alaska lacking fiber infrastructure.⁵

The Cartesian study prepared in support of the ACA Connects plan recognizes the unique situation in Alaska and claims that, “The plan provides for alternative delivery solutions in remote areas of Alaska where fiber deployment is not possible,” and “In Alaska, other means of connectivity are available.”⁶ But, the underlying ACA Connects Coalition Plan in fact provides no such alternatives, only the acknowledgement (discussed above) that an alternative is needed. Because the fiber deliver required by the Plan is prohibitively expensive in Alaska, and Alaska’s infrastructure is already built around C-Band spectrum, the only viable alternative delivery solution available in Alaska is the continued use of C-Band spectrum. And, because, as AT&T observes, “there is little, if any, dispute that FSS and terrestrial mobile services are not compatible as co-channel uses”⁷ in the 3.7-4.2 GHz band, the critical need for ongoing use of that band for satellite downlink operations in Alaska precludes its reallocation for terrestrial mobile use in our state.

⁵ “Aleutian Broadband Scoping Study,” Prepared for Southwest Alaska Municipal Conference, Meridian Project and Construction Management, March, 2018. <https://swamc.org/programs/aleutian-broadband-scoping-study/> last visited August 5, 2019.

⁶ “C-Band Spectrum Clearing Plan,” GN Docket Nos. 18-122 (filed July 11, 2019 at pg. 8, footnote 1, and pg. 21, footnote 1).

⁷ *Ex Parte* Letter from Henry Hultquist, AT&T Services, Inc., GN Docket No. 18-122 (filed May 23, 2019), at 2-3.

Due to the complete absence of fiber to many locations in Alaska and the extreme costs of constructing the fiber needed, the ACA Connects proposal is not viable for Alaska. Instead Alaska should be excluded from transfer of spectrum as called for by ATA, Alaska Communications, GCI, and the C-Band Alliance.⁸

The ATA respectfully requests the Commission protect broadband services in Alaska and preserve the vital infrastructure which relies on C-Band spectrum by exempting Alaska from the proposals discussed in the Public Notice and in the overall C-Band proceeding.

Respectfully submitted,

/s/

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⁸ Ex Parte Letter from Jennifer D. Hindin, GN Docket Nos. 17-183, 18-122 (filed Oct. 17, 2018 at Attachment A).